

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

Chasity Congious, by and through)
her Guardian, Kimberly Hammond,)
on behalf of herself and as Mother and)
Next Friend of Z.C.H., Deceased,)
)
)
 Plaintiff,)
)
)
 v. Case No. 4:22-cv-00092-O
)
)
City of Fort Worth, et al.,)
)
)
 Defendants.)

PLAINTIFF'S MOTION FOR RELIEF FROM JUDGMENT

Pursuant to Federal Rule of Civil Procedure 60(b)(2), Plaintiff respectfully moves the Court for relief from the Final Judgment as to Defendant Dr. Aaron Ivy Shaw. ECF No. 62. The basis for the motion is set forth in the brief in support of motion and the documents contained in the appendix filed herewith.

WHEREFORE, Plaintiff respectfully requests that the Court order that the Final Judgment as to Defendant Dr. Aaron Ivy Shaw is vacated and set aside.

Respectfully submitted,

/s/ Jarrett Adams
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CERTIFICATE OF CONFERENCE

Pursuant to Civil Local Rule 7.1, Plaintiff's counsel Jarrett Adams conferred with Defendant Dr. Aaron Ivy Shaw's counsel Jordan Parker on April 1, 2024. Agreement could not be reached because counsel for Defendant Dr. Aaron Ivy Shaw opposes Plaintiff's motion on the grounds of the Texas Tort Claims Act.

/s/Jarrett Adams
Jarrett Adams, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2024, I electronically filed the foregoing pleading with the United States District Court for the Northern District of Texas using the CM/ECF system, which will automatically serve a true and complete copy upon all counsel of record.

/s/Jarrett Adams
Jarrett Adams, Esq.